## INTERVENTION





GEORGE E. SILVA MEGEIVED SANTA CRUZ COUNTY ATTORNEY 2 **CHARLENE LAPLANTE**, Deputy County Attorney 1250 N. Congress Drive, Suite 201 2012 DEC 17 A 10: 01 3 Nogales, Arizona 85621 4 CORP COMMISSION BEFORE THE ARIZONA CORPORATION COMMISSION 5 6 **GARY PIERCE** COMMISSIONER Arizona Corporation Commission RECEIVED 7 **BOB STUMP** 8 SANDRA D. KENNEDY DEC 13 2012 COMMISSIONER 9 DEC 1 7 2012 PAUL NEWMAN ARIZONA CORP. COMM 400 W CONGRESS STE 218 TUCSON AZ 8570\* COMMISSIONER 10 **DOCKETED BY BRENDA BURNS** 11 COMMISSIONER 12 IN THE MATTER OF THE APPLICATION OF ) RIO RICO UTILITIES, INC., AN ARIZONA 13 Docket No. WS-02676A-12-0196 CORPORATION, FOR A DETERMINATION OF THE FAIR VALUE OF ITS UTILITY 14 SANTA CRUZ COUNTY'S PLANTS AND PROPERTY AND FOR 15 APPLICATION TO INTERVENE INCREASE IN ITS WATER AND WASTEWATER RATES AND CHARGES 16 FOR UTILITY SERVICES BASED THEREON.) 17 18 The County of Santa Cruz, a political subdivision of the State of Arizona 19 (County), respectfully applies for leave to intervene in this proceeding under A.A.C. R-20 14-3-105. 21 ١. 22 The County should be granted intervention. 23 Persons who are "directly and substantially affected by the proceedings" may 24 25 apply to intervene. A.A.C. R14-3-105. The County is a customer of Rio Rico Utilities, 26 and the County is therefore directly and substantially affected by a Decision or Order of

[Summary of pleading] -1

1	the Commission in this matter. Furthermore, many of the County's residents are
2	
3	customers of Rio Rico Utilities and those customers will be directly and substantially
4	affected by a Decision or Order of the Commission in this matter.
5	II.
6	Contact information
7	Copies of all documents, pleadings and pre-filed testimony, and all data requests
8	or other requests for information should be directed to:
10	Charlene Laplante
11	Deputy County Attorney Office of the Santa Cruz County Attorney
12	2150 N. Congress Drive, Ste. 201 Nogales, Arizona 85621
13	
14	III.
15	Conclusion
16	For the above reasons, the County respectfully requests that the Commission issue
17	a procedural order granting the County intervention in this case.
18 19	RESPECTFULLY SUBMITTED this 7 <sup>th</sup> day of December, 2012.
20	RESPECTFULLY SUBMITTIED this 7 day of Dedeniber, 2012.
21	Atomas ON VI
22	Charlene Laplante
23	Deputy County Attorney
24	
25	Original plus 15 copies of the foregoing filed
26	this 7th day of December, 2012, with:

1	Docket Control ARIZONA CORPORATION COMMISSION
2	400 W. Congress, Ste. 218 Tucson, AZ 85701-1347
3	1 ucsoil, Az 00101-1041
4	Copies of the foregoing mailed
5	this 7th day of December, 2012 to:
6	Lyn Farmer
7	Chief Administrative Law Judge Hearing Division
8	Arizona Corporation Commission
9	1200 West Washington Phoenix, Arizona, 85007
10	Janice Alward, Chief Counsel
11	Legal Division Arizona Corporation Commission
12	1200 West Washington
13	Phoenix, Arizona 85007
14	Steven Olea, Director Utilities Division
15	1200 West Washington Phoenix, Arizona 85007
16	Jay L. Shapiro
17	Fennemore Craig, P.C.
18	3003 N. Central Avenue Suite 2600
19	Phoenix, Arizona 85012 Attorneys for Rio Rico Utilities
20	Greg Sorensen
21	Vice President & General Manager
22	Liberty Utilities 12725 W. Indian School Road, Suite D-101
23	Avondale, AZ 85392
24	Daniel Pozefsky Chief Counsel
25	Residential Utility Consumer Office 1110 West Washington, Suite 220
26	Phoenix, Arizona 85007

Arizona Reporting Services, Inc. 2200 N. Central Ave., Ste. 502 Phoenix, Arizona 85004-1481

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Milca Pimienta